

Koch, Kristine

From: Koch, Kristine
Sent: Thursday, April 30, 2015 2:00 PM
To: James McKenna
Cc: 'Jennifer Woronets (jworonets@anchorqea.com)'; Bob Wyatt (rjw@nwnatural.com); Allen, Elizabeth (allen.elizabeth@epa.gov)
Subject: RE: Portland Harbor - Bioaccumulation Modeling Report

Jim –

The schedule seems fine, but EPA is requesting some clarification of a couple point noted in your email. At our April 10 meeting, the LWG stated that further calibration of the food web model was necessary for the dioxin/furan congeners to ensure that the final, calibrated Kow values followed a specific order such that chemicals that nominally appear to have greater lipid solubility can't be assigned Kow value lower than a similar chemical that may seem to be less soluble in lipids. As discussed at the meeting, EPA remains skeptical of this concept as applied to the food web model, because the calibrated Kow values fall within the plausible range for each chemical, and the calibration of the model was ultimately assessed on the species predictive accuracy factor (SPAF). Our review of the 2009 draft confirms that no factors other than the nominal range of acceptable values, combined with the SPAF was used at this stage of model calibration, and that no further calibration by comparing the Kows of differing chemicals was performed (note that Table 5-4 should be corrected to indicated that log Kow values are presented, not the Kow values themselves).

It appears that following this calibration of the model for dioxins/furans, the LWG intends to revisit the Kow and metabolic rate constants for all other contaminants for which the food web model had previously calibrated and finalized. EPA does not believe this step is either necessary or appropriate. Nothing in the documentation provided to EPA indicates that such a step has been conducted previously, or that Kow values for different chemicals were ever considered to be dependent variables. Note that EPA has previously approved the food web model versions submitted by the LWG, and that further modifications to those models would result in reconsideration of the food web model as developed by the LWG as a plausible tool for calculating PRGs for the Portland Harbor project. Please clarify.

Thanks,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, Suite 900, M/S ECL-122
Seattle, Washington 98101-3140

(206)553-6705
(206)553-8581 (fax)
1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

From: James McKenna [mailto:jim.mckenna@verdantllc.com]
Sent: Wednesday, April 29, 2015 1:25 PM
To: Koch, Kristine
Cc: 'Jennifer Woronets (jworonets@anchorqea.com)'; Bob Wyatt (rjw@nwnatural.com)
Subject: RE: Portland Harbor - Bioaccumulation Modeling Report

Kristine,

Per our discussion on April 10, 2015, the Windward team is calibrating the bioaccumulation model for the additional contaminants. We also committed to providing EPA a schedule to complete the calibration step and submit the revised report. We currently anticipate having the calibration step completed by mid-May. Once the calibration step is completed Windward will generate the text for the revised bioaccumulation report that documents and clearly explains the calibration step (i.e., per EPA's direction the description and documentation of the calibration step needs to be clear so that a third party can replicate the results.).

The results of the calibration step will also have a ripple effect on the text and multiple tables of the revised report (e.g., Windward will have to check and determine if the calibration step for the new contaminants had an impact on the K_{ow} and metabolism coefficients for the other contaminants). With the calibration step completed by mid-May the LWG can have a revised final draft report submitted to EPA by close-of-business June 19, 2015.

Please contact me if you have any questions.

Thanks

Jim McKenna
Verdant Solutions, LLC
5111 SE 41st Avenue
Portland, Oregon 97202
Office: (503) 477-5593
Cell: (503) 309-1621
jim.mckenna@verdantllc.com

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]
Sent: Friday, April 24, 2015 11:55 AM
To: Bob Wyatt (rjw@nwnatural.com); James McKenna
Cc: 'Jennifer Woronets' (jworonets@anchoragea.com)
Subject: Portland Harbor - Bioaccumulation Modeling Report

Bob and Jim – On April 10, 2015, EPA met with LWG and Windward to discuss the bioaccumulation modeling report. There were several action items for the LWG from the meeting.

- 1) Calibration of the food web model for dioxin/furan congeners
- 2) Revision to the Bioaccumulation modeling report.

In a project managers meeting on April 14, 2015, we asked the LWG for a schedule for when we were to receive these deliverables. The LWG indicated they would have a schedule to EPA by April 17, 2015, but we have yet to receive a schedule. Please provide a schedule for these deliverables by COB April 29, 2015.

Thanks,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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